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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

Mary Valdez,
Plaintiff,
v.
J.P.Morgan Chase Bank, N.A.,
Defendant.

Case No. 2:20-cv-02033-KJM-JDP

**FIFTH STIPULATION BETWEEN
J.P. MORGAN CHASE BANK, N.A.
AND MARY VALDEZ TO EXTEND
CHASE'S TIME TO RESPOND TO
THE COMPLAINT AND ORDER**

DAVIS WRIGHT TREMAINE LLP

1 Plaintiff Mary Valdez filed this action on October 12, 2020. Ms. Valdez
2 served Defendant JPMorgan Chase Bank, N.A. on October 13, 2020, making
3 Chase's response originally due on November 3, 2020. Based upon the allegations
4 in the Complaint, Chase requested and Ms. Valdez initially granted Chase until
5 December 1, 2020 to investigate the claims, evaluate early settlement, and
6 determine its response to the Complaint, and granted another extension to January
7 11, 2021, February 12, 2021 and again to March 19, 2021.

8 The parties have tentatively reached a settlement in the case that would
9 eliminate the need for further filings and Court proceedings if Chase has additional
10 time to respond to the Complaint. The parties are negotiating the language in a
11 settlement agreement and hope to have that finalized in the next few weeks.

12 The parties stipulate under Local Rule 144, with the Court's approval, that
13 Chase's time to respond to the Complaint is extended 31 days to April 19, 2021.
14 This is the fifth extension Ms. Valdez has granted to Chase. The extension will not
15 affect any other date in the case, because the Court continued the Scheduling
16 Conference to April 8, 2021.

17 IT IS SO STIPULATED.

18 DATED: March 16, 2021

Respectfully submitted,
DAVIS WRIGHT TREMAINE LLP

20 By: /s/ Joseph E. Addiego III
21 Joseph E. Addiego III
22 Frederick A. Haist
23 Attorneys for JPMorgan Chase Bank,
24 N.A.
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DAVIS WRIGHT TREMAINE LLP

DATED: March 16, 2021

MARTIN & BONTRAGER, APC

By: /s/ G. Thomas Martin, III

G. Thomas Martin, III

Nicholas J. Bontrager

Attorneys for Mary Valdez

ORDER

Pursuant to the parties' representations, the court grants another extension for defendant Chase Bank to respond to plaintiff's complaint. The new deadline is April 19, 2021. Accordingly, the Initial Scheduling Conference scheduled for April 8, 2021 is reset to May 20, 2021 at 2:30 p.m. and a Joint Status Report is to be filed with the court no less than fourteen (14) days prior to the Status Conference.

This order resolves ECF No. 15.

IT IS SO ORDERED.

DATED: March 18, 2021.


CHIEF UNITED STATES DISTRICT JUDGE